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CLERK US DISTRICT COURT
DISTRICT OF NEVADA
BY: DEPUTY

Anshu Bharat Pathak
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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ANSHU PATHAK, AN INDIVIDUAL; PLAINTIFF V. CHRIS FULLER; THE SAINT PETERSBURG COMPANY; MEATMANSTEAKS.COM; AND DOES 1 THROUGH 10, INCLUSIVE DEFENDANTS.	**2:17-cv-01571-JCM-VCF** 1. Trademark Infringement 15 U.S.C. § 1114 (1); 2. "Passing Off" Under the Lanham Act - 15 U.S.C. § 1125 (a); 3. Trademark Dilution - 15 U.S.C. § 1125 (c); 4. Cybersquatting -15 U.S.C. § 1125 (d); 5. Unjust Enrichment; 6. Demand for Accounting; 7. Constructive Trust; 8. Permanent Injunction [DEMAND FOR JURY TRIAL]

Plaintiff Anshu Bharat Pathak (referred to alternatively as "Plaintiff" from now on) at this moment complains and alleges as follows.

1. This complaint is brought to address the willful violation of Plaintiff's Trademarks rights in the phrase "**EXOTIC MEAT MARKET**" Trademarks Registration Number 4469007 by Defendants. [Exhibit 1]
2. Plaintiff has continuously used "EXOTIC MEAT MARKET" mark in commerce and acquired distinctiveness.
3. Plaintiff is a citizen of the State of Nevada.
4. Defendant Chris Fuller ("CHRIS") is a citizen of the State of Florida.
5. Defendant "CHRIS" owns MEATMANSTEAKS.COM.
6. Defendant "CHRIS" operates MEATMANSTEAKS.COM and THE SAINT PETERSBURG COMPANY.

7. THE SAINT PETERSBURG COMPANY is a Florida Profit Corporation.

JURISDICTION AND VENUE

8. This action arises under the Lanham Act, 15 U.S.C. § 1114 and §1125. This court has federal question jurisdiction over this action under 15 U.S.C. § 1121(a), 28 U.S.C. § 1331, and 28 U.S.C. § 1338 (a) and (b). This court has supplemental jurisdiction over Plaintiff's State Law Claims under 28 U.S.C. § 1367(a).
9. The venue is proper in this district under 28 U.S.C. § 1391 (b) and 28 U.S.C. § 1400(a).
10. All Defendants do business through Internet in State of Nevada.

UNDISPUTED FACTS

1. Plaintiff owns Trademarks rights in the phrase "**EXOTIC MEAT MARKET**" Trademarks Registration Number 4469007. [Exhibit 1]
2. Defendant CHRIS FULLER purchased domain name, "exoticmeatmarket.com" on May 27, 2017.
3. Defendant CHRIS FULLER, THE SAINT PETERSBURG COMPANY, and MEATMANSTEAKS.COM are direct competitors of Plaintiff.
4. Defendants and Plaintiff offers same and similar products to the public through their on-line retail stores.
5. Defendant CHRIS FULLER owns THE SAINT PETERSBURG COMPANY, A Florida Profit Corporation.
6. Defendant CHRIS FULLER owns MEATMANSTEAKS.COM.
7. The domain www.exoticmeatmarket.com forwards links to MEATMANSTEAKS.COM
8. Defendant CHRIS FULLER purchased the domain name with an intention to infringe Plaintiff's Trademark.
9. Plaintiff notified Defendant CHRIS FULLER that Plaintiff owns Trademarks rights in the phrase "**EXOTIC MEAT MARKET**" Trademarks Registration Number 4469007. [Exhibit 1]
10. Plaintiff notified Defendant CHRIS FULLER that his use of the domain name www.exoticmeatmarket.com infringes Plaintiff's Trademarks rights in the phrase "**EXOTIC MEAT MARKET**" Trademarks Registration Number 4469007. [Exhibit 1]
11. Plaintiff requested Defendant CHRIS FULLER to transfer ownership of infringing domain name, **www.exoticmeatmarket.com.**

12. Defendant CHRIS FULLER did not respond to Plaintiff's request to transfer ownership of the infringing domain name.
13. Defendant CHRIS FULLER did not respond to Plaintiff's phone call made on June 1, 2017. CHRIS FULLER.
14. Defendant CHRIS FULLER did not respond to Plaintiff's phone call made on June 2, 2017. CHRIS FULLER.
15. Defendant CHRIS FULLER did not respond to Plaintiff's e-mail sent on June 2, 2017.
16. Defendants continued to infringe Plaintiff's trademark.
17. On June 4, 2017, Plaintiff sent a copy of this complaint requesting Defendants to stop the infringement and transfer the domain name, exoticmeatmarket.com to Plaintiff.
18. As of filing of this complaint, Defendants did not transfer the domain name, exoticmeatmarket.com to Plaintiff.
19. Plaintiff has filed this action against Defendant CHRIS FULLER, THE SAINT PETERSBURG COMPANY, and MEATMANSTEAKS.COM in the amount of $ 300,000 for willfully infringing the Trademark to make profits.
20. Plaintiff has filed this action against Defendant CHRIS FULLER, THE SAINT PETERSBURG COMPANY, and MEATMANSTEAKS.COM in the amount of $ 300,000 for willfully engaging in the procurement of domain name for which Plaintiff owns the Trademark. [Exhibit 1]
21. Defendant CHRIS FULLER, THE SAINT PETERSBURG COMPANY, and MEATMANSTEAKS.COM willfully engaging in dilution of Plaintiff's Trademark. [Exhibit 1]

FIRST CAUSE OF ACTION

[INFRINGEMENT OF FEDERALLY REGISTERED TRADEMARKSS]

Trademarks Infringement 15 U.S.C. § 1114 (1) (a)]

(Against All Defendants)

22. Plaintiff alleges and incorporates by reference each allegation outlined in above paragraphs, inclusive.
23. This cause of action arises under §32 of Lanham Act, 15 U.S.C. § 1114 for infringement of Registered Trademarks.

24. This complaint is brought to address the willful violation of Plaintiff's Trademarks rights in the phrase "**EXOTIC MEAT MARKET**" Trademarks Registration Number 4469007 by **Defendants**. [Exhibit 1]
25. Plaintiff has continuously used "EXOTIC MEAT MARKET" mark in commerce and acquired distinctiveness. [Exhibit 1]
26. Defendants have violated Plaintiff's Trademarks rights under section 1125(a).
27. Defendants have violated Plaintiff's Trademarks rights under section 1125 (d).
28. Defendants have willfully violated Plaintiff's Trademarks rights under section 1125(c).
29. Defendants have willfully used counterfeit mark and designation as defined in section 1116(d) of this title.
30. Plaintiff is entitled to recover subject to the provisions of sections 1111 and 1114 of this title, and subject to the principles of equity, to recover (1) defendant's profits, (2) any damages sustained by the plaintiff, and (3) the costs of the action.
31. Plaintiff is entitled to recover "**Treble damages for the use of counterfeit mark**" under subsection (a) for any violation of section 1114(1)(a) of this title.
32. Plaintiff is entitled to recover "**Treble damages for the use of counterfeit mark**" under section 220506 of title 36.
33. Plaintiff is entitled to recover "**Treble damages for the use of counterfeit mark**" under section 1116(d).
34. Defendants have intentionally used a mark or designation, knowing such mark or designation is a counterfeit mark as defined in section 1116(d) of this title, in connection with the sale, offering for sale, or distribution of goods or services; or providing goods or services necessary to the commission of a violation specified in paragraph (1), with the intent that the recipient of the goods or services would put the goods or services to use in committing the violation.
35. Plaintiff prays prejudgment interest on such amount at an annual interest rate established under section 6621(a)(2) of title 26, beginning on the date of the service of the claimant's pleadings setting forth the claim for such entry of judgment and ending on the date such entry is made, or for such shorter time as the court considers appropriate.

36. Plaintiff prays statutory damages for the use of counterfeit marks as defined in section 1116(d) (2) for $2,000,000 per counterfeit mark per type of goods or services sold, offered for sale, or distributed, as the court considers just.
37. In this action, Plaintiff prays statutory damages for the use of counterfeit marks as defined in section 1116(d) for $2,000,000 for the use of two counterfeit marks.
38. Plaintiff prays statutory damages in violation of section 1125(d) (1) of $100,000 per domain name.
39. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against CHRIS FULLER.
40. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against MEATMANSTEAKS.COM.
41. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against THE SAINT PETERSBURG COMPANY.
42. Defendants aforesaid acts of infringement have caused Plaintiff sustain monetary damage, loss, and injury, to an extent not yet ascertained.

SECOND CAUSE OF ACTION

[“Passing Off” Under the Lanham Act -15 U.S.C. § 1125 (a)]

(Against All Defendants)

43. Plaintiff alleges and incorporates by reference each allegation outlined in above paragraphs, inclusive.
44. Defendants are thus liable under 15 U.S.C. § 1125(a) for unfair competition by its uses of Plaintiff’s registered Trademark. [Exhibit 1]
45. Defendants have violated Plaintiff’s Trademarks rights under section 1125(a).
46. Defendants have violated Plaintiff’s Trademarks rights under section 1125 (d).
47. Defendants have willfully violated Plaintiff’s Trademarks rights under section 1125(c).
48. Defendants have willfully used counterfeit mark and designation as defined in section 1116(d) of this title.
49. Plaintiff is entitled to recover subject to the provisions of sections 1111 and 1114 of this title, and subject to the principles of equity, to recover (1) defendant’s profits, (2) any damages sustained by the plaintiff, and (3) the costs of the action.

50. Plaintiff is entitled to recover "**Treble damages for the use of counterfeit mark**" under subsection (a) for any violation of section 1114(1)(a) of this title.
51. Plaintiff is entitled to recover "**Treble damages for the use of counterfeit mark**" under section 220506 of title 36.
52. Plaintiff is entitled to recover "**Treble damages for the use of counterfeit mark**" under section 1116(d).
53. All Defendants have intentionally used a mark or designation, knowing such mark or designation is a counterfeit mark as defined in section 1116(d) of this title, in connection with the sale, offering for sale, or distribution of goods or services; or providing goods or services necessary to the commission of a violation specified in paragraph (1), with the intent that the recipient of the goods or services would put the goods or services to use in committing the violation.
54. All Defendants related to Chris Fuller have intentionally used a mark or designation, knowing such mark or designation is a counterfeit mark as defined in section 1116(d) of this title, in connection with the sale, offering for sale, or distribution of goods or services; or providing goods or services necessary to the commission of a violation specified in paragraph (1), with the intent that the recipient of the goods or services would put the goods or services to use in committing the violation.
55. Plaintiff prays prejudgment interest on such amount at an annual interest rate established under section 6621(a)(2) of title 26, beginning on the date of the service of the claimant's pleadings setting forth the claim for such entry of judgment and ending on the date such entry is made, or for such shorter time as the court considers appropriate.
56. Plaintiff prays statutory damages for the use of counterfeit marks as defined in section 1116(d) for $2,000,000 per counterfeit mark per type of goods or services sold, offered for sale, or distributed, as the court considers just.
57. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against CHRIS FULLER.
58. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against MEATMANSTEAKS.COM.
59. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against THE SAINT PETERSBURG COMPANY.

60. Defendants aforesaid acts of infringement have caused Plaintiff sustain monetary damage, loss, and injury, to an extent not yet ascertained.

THIRD CAUSE OF ACTION

[Trademarks Dilution – 15 U.S.C. § 1125 False designations of origin, false descriptions, and dilution forbidden]

(Against All Defendants)

61. Plaintiff re-alleges and incorporates by reference each allegation outlined in above paragraphs, inclusive.
62. Plaintiff's "EXOTIC MEAT MARKET" is famous mark under the common law and the factors described for protection against dilution in 15 U.S.C. § 1125 and transcend the **specific classes of goods and services for which Plaintiff has registered** its "EXOTIC MEAT MARKET" mark. [Exhibit 1]
63. Defendant's use of "INFRINGING DOMAIN NAME" has diluted Plaintiff's famous "EXOTIC MEAT MARKET" mark under 15 U.S.C.§ 1125. [Exhibit 1]
64. Defendants have violated Plaintiff's Trademarks rights under section 1125(a).
65. Defendants have violated Plaintiff's Trademarks rights under section 1125 (d).
66. Defendants have willfully violated Plaintiff's Trademarks rights under section 1125(c).
67. Defendants have willfully used counterfeit mark and designation as defined in section 1116(d) of this title.
68. Plaintiff is entitled to recover subject to the provisions of sections 1111 and 1114 of this title, and subject to the principles of equity, to recover (1) defendant's profits, (2) any damages sustained by the plaintiff, and (3) the costs of the action.
69. Plaintiff is entitled to recover **"Treble damages for the use of counterfeit mark"** under subsection (a) for any violation of section 1114(1)(a) of this title.
70. Plaintiff is entitled to recover **"Treble damages for the use of counterfeit mark"** under section 220506 of title 36.
71. Plaintiff is entitled to recover **"Treble damages for the use of counterfeit mark"** under section 1116(d).
72. Defendants have intentionally used a mark or designation, knowing such mark or designation is a counterfeit mark as defined in section 1116(d) of this title, in connection with the sale, offering for sale, or distribution of goods or services; or providing goods or

services necessary to the commission of a violation specified in paragraph (1), with the intent that the recipient of the goods or services would put the goods or services to use in committing the violation.

73. Plaintiff prays prejudgment interest on such amount at an annual interest rate established under section 6621(a)(2) of title 26, beginning on the date of the service of the claimant's pleadings setting forth the claim for such entry of judgment and ending on the date such entry is made, or for such shorter time as the court considers appropriate.

74. Plaintiff prays statutory damages for the use of counterfeit marks as defined in section 1116(d) (2) for $2,000,000 per counterfeit mark per type of goods or services sold, offered for sale, or distributed, as the court considers just.

75. Plaintiff prays statutory damages in violation of section 1125(d) (1) of $100,000 per domain name against all Defendants.

76. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against CHRIS FULLER.

77. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against MEATMANSTEAKS.COM.

78. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against THE SAINT PETERSBURG COMPANY.

79. Defendants aforesaid acts of infringement have caused Plaintiff sustain monetary damage, loss, and injury, to an extent not yet ascertained.

FORTH CAUSE OF ACTION

[Cybersquatting in violation of the Lanham Act § 43(d), 15 U.S.C. § 1125 (d)]

(Against All Defendants)

80. Plaintiff re-alleges and incorporates by reference each allegation outlined in above paragraphs, inclusive.

81. Because Defendant's actions in using "COUNTERFEIT TRADEMARKS" and "INFRINGING DOMAIN NAMES" was intentional and in bad faith, the court should enter an award of enhanced damages under 15 U.S.C. § 1117(a) (3) in an amount up to three times the actual damages. [All Exhibits]

82. Defendants intended to create an association with Plaintiff's marks by using "COUNTERFEIT TRADEMARKS" and "INFRINGING DOMAIN NAMES" to divert business to them. [Exhibit 1]

83. There is no actual association between Defendants and Plaintiff.

84. Defendants have been using "COUNTERFEIT TRADEMARKS" and "INFRINGING DOMAIN NAMES" is intentional and in bad faith to divert the customers looking for Plaintiff's products and services to their websites to sell their products and services.

85. As a direct result of Defendants' actions, Plaintiff has suffered substantial damage, in an amount to be proven at trial.

86. Since Defendants' acts have caused Plaintiff irreparable, ongoing injury of a nature that cannot be adequately compensated or measured in damages, Plaintiff has no adequate remedy at law and will suffer immediate and irreparable loss, damage and injury unless Defendants are restrained and enjoined from continuing to engage in such wrongful conduct.

87. In this action, Plaintiff prays statutory damages for the use of counterfeit marks as defined in section 1116(d) for $2,000,000 against all named Defendats.

88. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against CHRIS FULLER.

89. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against MEATMANSTEAKS.COM.

90. In this action, Plaintiff prays for statutory damages in violation of section 1125(d) (1) of $100,000 for ONE (1) domain names against THE SAINT PETERSBURG COMPANY.

91. Defendants aforesaid acts of infringement have caused Plaintiff sustain monetary damage, loss, and injury, to an extent not yet ascertained.

FIFTH CAUSE OF ACTION

[Unjust Enrichment]

(Against All Defendants)

92. Plaintiff re-alleges and incorporates by reference each allegation outlined in above paragraphs, inclusive.

93. By reasons of the preceding facts, Defendants and each of them, have become unjustly enriched at the expense of Plaintiff by profiting from the use of Plaintiff's Trademarks and by realizing a monetary gain from their unauthorized use of said mark.

94. Under Nevada law, the elements of an unjust enrichment claim or, "quasi contract" claim, are:

(1) a benefit conferred on the defendant by the plaintiff;

(2) appreciation of the benefit by the defendant; and

(3) acceptance and retention of the benefit by the defendant

(4) in circumstances where it would be inequitable to retain the benefit without payment. *Kennedy v. Carriage Cemetery Services, Inc.*,

95. Unjust enrichment occurs "when ever a person has and retains a benefit which in equity and good conscience belongs to another." Unionamerica Mtg., 97 Nev. at 212, 626 P.2d at 1273.

96. In this case all Defendants have benifitted out of infringing Plaintiff's Trademark by making profits.

97. In this case all the Defendants intentionally, willingly and knowingly engaged in direct and indirect infringement with intention to make profit.

98. Defendants would not have infringed the Trademark or engaged in the activity to infringe the Trademark for not making profit for their personal benefits.

99. Defendants and each of them have become unjustly enriched in an amount that cannot be precisely ascertained at this time but will be ascertained according to proof at trial.

SIXTH CAUSE OF ACTION

[Demand for Accounting]

(Against All Defendants)

100. Plaintiff re-alleges and incorporates by reference each allegation outlined in above paragraphs, inclusive.

101. As seen above, Plaintiff has an interest in all of the money that is generated from the exploitation of Plaintiff's Trademarks.

102. Plaintiff is informed and believes that Defendants have generated an undetermined, yet substantial amount of money, due to commercial exploitation of Plaintiff's Trademarks.

103. The amount of money due from Defendants is unknown to Plaintiff and cannot be ascertained without an accounting of all the Defendant's financial records related to the sales generated through their infringing activities.

104. As a result of Defendant's actions, or lack thereof, Plaintiff has been damaged in an amount to be proven after an accounting has been conducted. Accordingly, Plaintiff at this moment requests that the Court order an accounting of all of Defendant's financial records related to the infringing activities to determine the sums rightfully due to Plaintiff. Furthermore, Plaintiff demands that those sums be paid to it.

SEVENTH CAUSE OF ACTION

[Constructive Trust]

(Against All Defendants)

105. Plaintiff re-alleges and incorporates by reference each allegation outlined in above paragraphs, inclusive.

106. Plaintiff is informed and believes that Defendants have generated an undetermined, yet substantial amount of money, due to commercial exploitation of Plaintiff's Trademarks.

107. As seen above, Plaintiff is entitled to all of the money that is generated from the infringing activities. Plaintiff has not given its consent for Defendants to utilize its Trademarks. Such monies should be placed in a constructive trust until this matter is resolved.

EIGHTH CAUSE OF ACTION

[Permanent Injunction]

(Against All Defendants)

108. Plaintiff re-alleges and incorporates by reference each allegation outlined in above paragraphs, inclusive.

109. Plaintiff further contends that Defendants' activities have and will continue to infringe and or dilute its famous and distinctive Trademarks.

110. At this time Defendants continue to engage in the aforementioned infringing activity.

111. These actions on behalf of Defendants are wrongful and should be enjoined in that they have caused, and continue to cause, Plaintiff great and irreparable injury.

112. Plaintiff has no other plain, speedy and adequate remedy at law, and the injunctive relief prayed for below is necessary and appropriate at this time to prevent irreparable loss to Plaintiff's interests.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants and each of them as follows.

1. Defendants have violated Plaintiff's Trademarks rights under section 1125(a).
2. Defendants have violated Plaintiff's Trademarks rights under section 1125 (d).
3. Defendants have willfully violated Plaintiff's Trademarks rights under section 1125(c).
4. Defendants have willfully used counterfeit mark and designation as defined in section 1116(d) of this title.
5. Plaintiff is entitled to recover subject to the provisions of sections 1111 and 1114 of this title, and subject to the principles of equity, to recover (1) defendant's profits, (2) any damages sustained by the plaintiff, and (3) the costs of the action.
6. Plaintiff is entitled to recover **"Treble damages for the use of counterfeit mark"** under subsection (a) for any violation of section 1114(1)(a) of this title.
7. Plaintiff is entitled to recover **"Treble damages for the use of counterfeit mark"** under section 220506 of title 36.
8. Plaintiff is entitled to recover **"Treble damages for the use of counterfeit mark"** under section 1116(d).
9. Defendants have intentionally used a mark or designation, knowing such mark or designation is a counterfeit mark as defined in section 1116(d) of this title, in connection with the sale, offering for sale, or distribution of goods or services; or providing goods or services necessary to the commission of a violation specified in paragraph (1), with the intent that the recipient of the goods or services would put the goods or services to use in committing the violation.
10. Plaintiff prays prejudgment interest on such amount at an annual interest rate established under section 6621(a)(2) of title 26, beginning on the date of the service of the claimant's pleadings setting forth the claim for such entry of judgment and ending on the date such entry is made, or for such shorter time as the court considers appropriate.

11. Plaintiff prays statutory damages for the use of counterfeit marks as defined in section 1116(d) (2) for $2,000,000 per counterfeit mark per type of goods or services sold, offered for sale, or distributed, as the court considers just.
12. In this action, Plaintiff prays statutory damages for the use of counterfeit marks as defined in section 1116(d) for $2,000,000 against each named Defendants.
13. That Plaintiff is awarded actual damages in an amount proven at trial or minimum of $ 12 Million.
14. That Defendants disgorge all profits derived from their wrongful conduct;
15. Interest at the maximum legal rate;
16. All reasonable attorney's fees and costs incurred herein;
17. For treble damages according to proof at trial;
18. That the court grants such other, further, and different relief as the Court deems just and proper under the circumstances.

Anshu Bharat Pathak;
Plaintiff
June 5, 2017

DEMAND FOR JURY TRIAL

Plaintiff at this moment demands a jury trial as provided by Rule 38 (a) of the Federal Rules of Civil Procedure.

Anshu Bharat Pathak; Plaintiff
In Pro Per
June 5, 2017

United States of America

United States Patent and Trademark Office

EXOTIC MEAT MARKET

Reg. No. 4,469,007

Registered Jan. 21, 2014

Int. Cl.: 35

SERVICE MARK

PRINCIPAL REGISTER

PATHAK ANSHU BHARAT (UNITED STATES INDIVIDUAL)
P O BOX 9192
MORENO VALLEY, CA 92552

FOR: ON-LINE RETAIL GIFT SHOPS, ON-LINE RETAIL STORE SERVICES FEATURING EXOTIC MEATS, HOTDOGS, SAUSAGES, SALAMIS; ON-LINE WHOLESALE STORE SERVICES FEATURING EXOTIC MEATS, HOTDOGS, SAUSAGES, SALAMIS; OPERATING AN ON-LINE SHOPPING SITE IN THE FIELD OF EXOTIC MEATS, HOTDOGS, SAUSAGES, SALAMIS; RETAIL AND ON-LINE GROCERY STORE SERVICES FEATURING HOME DELIVERY SERVICE, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 12-10-1999; IN COMMERCE 12-10-1999.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "MEAT MARKET", APART FROM THE MARK AS SHOWN.

SEC. 2(F) AS TO "EXOTIC MEAT MARKET".

SER. NO. 85-811,808, FILED 1-2-2013.

INGA ERVIN, EXAMINING ATTORNEY

Michelle K. Lee

Deputy Director of the United States Patent and Trademark Office

EXHIBIT 1